



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF
ENVIRONMENTAL CLEANUP

August 9, 2012

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Mr. Bob Wyatt
NW Natural
220 NW 2nd Avenue
Portland OR 97209

sent via email only

Mr. Tom McCue
Siltronic Corporation
7200 NW Front Avenue, M/S 20
Portland, Oregon 97210-3676

RE: Response to NW Natural's Response to EPA Comments on NW Natural Proposal to Complete Additional Field Visual Surveys at the Gasco Sediments Site during August and September 2012

Dear Sirs:

EPA has reviewed NW Natural's August 7, 2012 response to EPA's July 31, 2012 conditional approval of the "NW Natural Proposal to Complete Additional Field Visual Surveys at the Gasco Sediments Site during August and September 2012," dated July 24, 2012. EPA indicated in the July 31, 2012 comments that, "The area of the survey should also be expanded to include the U.S. Army Corps of Engineers, U.S. Moorings dock area downstream of the Gasco/U.S. Moorings property line..." NW Natural responded that, "NW Natural will limit the field visual surveys to the extent of the 'Initial Project Area,' approved by EPA for the Gasco Sediments Site as defined in Figure 5 of the *Final Project Area Identification Report and Data Gaps QAPP...*" EPA directs NW Natural to include the U.S. Moorings dock area downstream of the Gasco/U.S. Moorings property line in the survey area. EPA's rationale for this direction is described below. In its comments on the Gasco Sediments Site Engineering Evaluation/Cost Analysis (Gasco EE/CA) Technical Briefing (November 28, 2011), EPA commented that, "The areas delineated with substantial product do not include data points designated as containing substantial product (samples ending in 18SB, 20SB and 23SB) off the U.S. Moorings property..." EPA also noted that, "The boundary line at this location appears to coincide with the downstream property boundary of the Gasco site and is not a reflection of the probable extent of contamination from the Gasco site." NW Natural and Siltronic's response, dated December 23, 2011, stated that, "As noted in the EE/CA Technical Briefing, all data presented were preliminary and potentially subject to change. The draft EE/CA and Data Report will re-evaluate in detail all cores for the potential presence of substantial product within the larger Gasco Sediments Site Area of Interest, which includes the referenced area just offshore of the U.S. Moorings property." The Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action Statement of Work (SOW) details the iterative project area identification process:

- Section 3.4.1 indicates that the “Initial Project Area” defined in the *Final Project Area Identification Report and Data Gaps QAPP* is a “preliminary” boundary that is subject to revision through “data gathering, alternatives evaluation, and design.”
- Section 3.4.1.2, page 17, second paragraph states that with regards to the “Initial Project Area” identification within the Area Identification Report (AIR): “It is fully recognized that this initial set of parameters will be used as a starting point for the later project area refinements for the EE/CA and final project area identification for the design.”
- Section 3.4.2 indicates that one of the purposes of identifying and filling data gaps is to refine the project area boundary to support the evaluation of removal alternatives in the Gasco EE/CA.

The language in the AOC SOW clearly states that the initial project area defined in the *Final Project Area Identification Report and Data Gaps QAPP* is preliminary and subject to revision based on additional data and is not to be used as the basis for evaluation of removal alternatives in the Gasco EE/CA.

The Gasco EE/CA is currently being reviewed by EPA, including the interim project area identification, and comments have not yet been submitted. Initial review of the draft Gasco EE/CA suggests that the interim project area does not properly consider sediment data collected offshore of the U.S. Government Moorings site. The Final Remedial Investigation (RI) report for the U.S. Government Moorings site states: “In all the under-dock cores (except SDUD-4), Dredge Areas A and C, and at SDDB-20 the subsurface sediments contained black laminar bands of PAH [polycyclic aromatic hydrocarbon] enriched sediment with diffuse sheen and strong PAH odor.”

Evidence collected to date suggests that the U.S. Mooring dock area should be included in the interim project area boundary because GASCO waste has come to be located there, but we can further discuss that issue upon your receipt of EPA's comments on the EE/CA. Given GASCO waste is present at the U.S. Moorings dock area, the visual survey at least will provide information whether actions to control sheen are needed, and may provide additional data useful to evaluating remedial alternatives in the future.

Subject to the direction in this letter, work may begin. Please let me know if you have any questions or concerns about this letter at (206) 553-1220 or via email at sheldrake.sean@epa.gov. Legal inquiries may be addressed to Lori Cora at (206) 553-1115 or via email at cora.lori@epa.gov.

Sincerely,

A handwritten signature in dark ink, appearing to be 'SS', with a long horizontal line extending to the right.

Sean Sheldrake, RPM

Enclosure

Cc:

Kristine Koch, EPA
Chip Humphrey, EPA
Mark Ader, EPA
Dana Bayuk, ODEQ

via email only